

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

NEXT Payment Solutions, Inc.,	)	
	)	
Plaintiff,	)	Case No. 17 CV 8829
	)	
vs.	)	Honorable Ruben Castillo
	)	U.S. Magistrate Judge Young Kim,
CLEAResult Consulting, Inc.,	)	
	)	<b>JURY TRIAL DEMANDED</b>
Defendant.	)	

**MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiff, NEXT Payment Solutions, Inc. by and through its attorney, does hereby move this Court for Leave to File Exhibits Under Seal and, in support, states as follows:

1. Pursuant to Court Order, an amended complaint (verified) was filed in this case on March 1, 2018. (Dkt. 36).

2. The amended complaint sets forth claims for breach of contract.

3. Attached to the amended complaint is Ex. 1, a Master Services Agreement. That Agreement has two exhibits, A and B, both of which the parties agree contain confidential proprietary and pricing information. Therefore, as Defendant did when attaching the Master Services Agreement to their Motion to Dismiss, Plaintiff redacted Exs. A and B to Ex. 1 (Dkt. 36-1 pp. 10-13) to the amended complaint. By this motion, Plaintiff seeks to file Exs. A and B, unredacted under seal.

4. Also attached to the amended complaint are Exs. 2-9 (Dkt. 36-2-36-3), Statements of Work executed between the parties pursuant to the Master Services Agreement and at issue in the amended complaint. These documents contain the notation at the bottom that the contents of them are confidential and proprietary. Therefore,

Plaintiff's filed redacted copies of Exs. 2-9. Plaintiff seeks to file unredacted copies of Exs. 2-9 Under Seal.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that this Court grant them leave to file unredacted copies of Exs. A and B to Ex. 1 and Exs. 2-9 under seal.

RESPECTFULLY SUBMITTED,

NEXT Payment Solutions, Inc.

BY: /s/ Susan Bogart

Law Offices of Susan Bogart  
70 West Madison St., Ste. 1400  
Chicago, IL 60602  
Tele: 312-214-3271  
[sbogart514@aol.com](mailto:sbogart514@aol.com)